

MARINO, TORTORELLA & BOYLE, P.C.

KEVIN H. MARINO
JOHN D. TORTORELLA
JOHN A. BOYLE

ROSEANN BASSLER DAL PRA*
EREZ J. DAVY*
ANTHONY J. TAGLIAFERRO
MICHAEL J. FLYNN

ATTORNEYS AT LAW
437 SOUTHERN BOULEVARD
CHATHAM, NEW JERSEY 07928-1488
TELEPHONE (973) 824-9300
FAX (973) 824-8425
www.khmarino.com

875 THIRD AVENUE, 21ST FLOOR
NEW YORK, NEW YORK 10022
TELEPHONE (212) 307-3700
FAX (212) 542-3790
e-mail: jtortorella@khmarino.com
*OF COUNSEL

January 24, 2025

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
U.S. Post Office & Courthouse
2 Federal Square
Newark, NJ 07102

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS
MDL No. 3080 | Bi-weekly status report

Dear Judge Martinotti:

Pursuant to CMO #5, the parties provide the following status update for the weeks ending January 17 and 24:

All Tracks:

1. The parties are meeting and conferring about a procedure for exchanging information to be included in bi-weekly status reports and pre-CMC agendas.
2. The parties are continuing to meet and confer regarding various discovery issues in accordance with Case Management Order #17 (Discovery Dispute Protocol) [ECF No. 386].

SFP Plaintiff Fact Sheets: Certain Plaintiffs in the SFP Track have been producing Plaintiff Fact Sheets and corresponding document productions. The parties will meet and confer, as necessary, in accordance with Case Management Order #14 (Plaintiff Fact Sheet Implementation Order) [ECF No. 315].

For the Court's reference, the parties enclose a current list of motions before Your Honor.

Thank you for your continuing attention to this matter.

Respectfully submitted,

/s Matthew F. Gately
Matthew F. Gately
Liaison Counsel for
Class Action Track

/s Joanne Cicala
Joanne Cicala
Liaison Counsel for
State Attorneys General Track

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ATTORNEYS AT LAW

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/s/ David R. Buchanan

David R. Buchanan

Liaison Counsel for

Self-Funded Payer Track

/s/ John D. Tortorella

John D. Tortorella

Enclosures

cc: Honorable Rukhsanah L. Singh, U.S.M.J.
All counsel of record

In re Insulin Pricing Litigation (MDL No. 3080)

Case No. 2:23-md-03080-BRM-RLS

Motion List as of January 24, 2025

The bullets below correspond to the docket numbers of all submissions relating to each of these fully briefed motions, including opening papers, opposition papers, and replies.¹

MDL: State Attorney General Track

Montana

- Rule 12(b)(6) Motions
 - Manufacturer Defendants' Motion (Dkt. Nos. 190, 190-1 to 190-10, 190-22, 190-27)
 - PBM Defendants' Motion (Dkt. Nos. 190-11, 190-12, 190-23, 190-28)
- Rule 12(b)(2) Motions
 - Evernorth Health Inc.'s Motion (Dkt. Nos. 190-13, 190-14, 190-20, 190-24)
 - CVS Health Corporation's Motion (Dkt. Nos. 190-15, 190-16, 190-21, 190-26)
 - UnitedHealth Group Inc. & OptumInsight, Inc.'s Motion (Dkt. Nos. 190-17, 190-18, 190-19, 190-25)
- Supplemental Briefing
 - Manufacturers' Motions (Dkt. Nos. 190-51, 190-53)
 - PBMs' Motions (Dkt. Nos. 190-52, 190-54)

Illinois

- Rule 12(b)(6) Motions
 - Manufacturer Defendants' Motion (Dkt. Nos. 190-36, 190-37, 190-43, 190-49)
 - PBM Defendants' Motion (Dkt. Nos. 190-38, 190-39, 190-44, 190-48)
- Rule 12(b)(2) Motions
 - Evernorth Health Inc.'s Motion (Dkt. Nos. 190-30, 190-31, 190-41, 190-47)
 - CVS Health Corporation's Motion (Dkt. Nos. 190-32, 190-33, 190-42, 190-45)
 - UnitedHealth Group Inc. & OptumInsight, Inc.'s Motion (Dkt. Nos. 190-34, 190-35, 190-40, 190-46)

¹ The parties understand that motions to remand were filed in certain case that were subsequently transferred to the MDL. We read CMO #5 to mean that those motions are not currently pending before the MDL and, therefore, have not included them on this list.

- Supplemental Briefing
 - Manufacturers' Motions (Dkt. Nos. 190-51, 190-53)
 - PBMs' Motions (Dkt. Nos. 190-52, 190-54)

Mississippi

- Rule 12(c) Motion
 - Manufacturer Defendants' Motion (Dkt. Nos. 200, 231, 277)

MDL: Self-Funded Payer Track

Albany, King, and Lake County

- Rule 12(b)(6) Motions
 - Manufacturers' Motion (Dkt. Nos. 249-50, 256, 258)
 - PBM Defendants' Motion (Dkt. Nos. 251-55, 257, 259)